

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANA BYRNE, on behalf of herself and on behalf of all other similarly situated persons,

Plaintiffs,

vs.

RMJM, INC.; RMJM GROUP, INC.; RMJM HILLIER GROUP, INC.; RMJM HILLIER WORLDWIDE, INC.; RICHARD BAILES; DECLAN THOMPSON; and PETER MORRISON,

Defendants.

Civil Action No. 12-CIV-08203 (PKC)

ECF CASE

STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANTS' TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Dana Byrne ("Plaintiff") and Defendants RMJM, Inc., RMJM Group, Inc. (formerly known as "RMJM Hillier Group, Inc."), RMJM Worldwide, Inc. (formerly known as "RMJM Hiller Worldwide Architecture, Inc."), Richard Bailes, Declan Thompson, and Peter Morrison (collectively, "Defendants"), by their undersigned counsel, subject to the Court's approval, that the time for Defendants to answer, move, or otherwise respond to the Complaint filed by Plaintiff in the above-captioned action (the "Complaint") is hereby extended from December 5, 2012 up to and including January 7, 2013. There have been no previous requests in this matter for an extension of Defendants' time to respond to the Complaint.

IT IS FURTHER STIPULATED AND AGREED that Defendants shall not object or otherwise challenge Plaintiff's service of process of the Complaint on any of the Defendants named therein. Plaintiffs acknowledge and agree that the foregoing is without prejudice to any

other defenses or objections by Defendants in this matter, including but not limited to defenses based on the Court's lack of personal jurisdiction over any of the Defendants.

Dated: New York, New York
December 4, 2012

THOMPSON WIGDOR LLP

By:


Douglas H. Wigdor
David E. Gottlieb

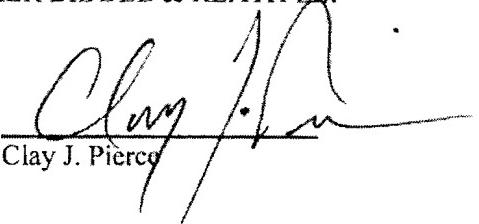
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Attorneys for Plaintiff

SO ORDERED this 4th day of December, 2012.

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Attorneys for Defendants


Hon. P. Kevin Castel
United States District Judge